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October 29, 2021

VIA ECF

Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *GateGuard, Inc. v. Goldmont Realty Corp., et al.*
Case No.: 1:20-cv-01609-AJN-GWG

Dear Judge Gorenstein:

I represent Plaintiff GateGuard, Inc. and write seeking an extension of the deadline to complete fact discovery in the subject case.

Defendants previously sought extensions to the discovery cutoff (currently November 1, 2021 – *see* ECF No. 66). Though discovery has since progressed (with the parties conducting three depositions and exchanging additional document discovery), several items remain. These include a Rule 30(b)(6) deposition of defendant Goldmont Realty Corp. and the resolution of other outstanding discovery requests.¹

We therefore ask the Court to extend the fact discovery deadline to December 31, 2021, to enable the parties to complete such outstanding discovery. Defendants consent to this request.

Respectfully submitted,

By: /s/ Ariel Reinitz

Ariel Reinitz

cc: Counsel of Record (via ECF)

¹ Plaintiff noticed Goldmont's 30(b)(6) deposition for October 28, 2021. Over a two-week period, Plaintiff made multiple attempts to confer with Defendants re: the subject matter of the deposition (as Rule 30(b)(6) now requires) but received no response. On October 27, 2021, after being contacted by a court reporter regarding the deposition, Defendants indicated that "[t]here will be no deposition... tomorrow[]" and offered to confer at a later date. The parties are now scheduled to confer this Monday (November 1, 2021) regarding the subject matter of Goldmont's 30(b)(6) deposition.